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25 RASIER, LLC; and RASIER-CA, LLC

26 **UNITED STATES DISTRICT COURT**  
27 **NORTHERN DISTRICT OF CALIFORNIA**  
28 **SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.  
SHORTNACY IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS  
CASES FOR FAILURE TO COMPLY WITH  
COURT ORDER**

This Document Relates to:

Date: August 22, 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

*Jane Doe LS 98 v. Uber Technologies,  
Inc., et al.*, No. 3:23-cv- 05412-CRB

1 *Jane Doe LS 326 v. Uber Technologies,*  
2 *Inc., et al., No. 3:23-cv- 05415-CRB*

3 *Jane Doe LS 245 v. Uber Technologies,*  
4 *Inc., et al., No. 3:23-cv- 05944-CRB*

5 *T.W. v. Uber Technologies, Inc., et al.,*  
6 *No. 3:24-cv- 00559-CRB*

7 *P.K. v. Uber Technologies, Inc., et al.,*  
8 *No. 3:24-cv- 00572-CRB*

9 *D.P. v. Uber Technologies, Inc., et al.,*  
10 *No. 3:24-cv- 04449-CRB*

11 *Jane Roe CL 16 v. Uber Technologies,*  
12 *Inc., et al., No. 3:24-cv-04837-CRB*

13 *Jane Roe CL 24 v. Uber Technologies,*  
14 *Inc., et al., No. 3:24-cv- 05536-CRB*

15 *Jane Roe CL 34 v. Uber Technologies,*  
16 *Inc., et al., No. 3:24-cv- 05696-CRB*

17 *Jane Roe CL 36 v. Uber Technologies,*  
18 *Inc., et al., No. 3:24-cv- 05720-CRB*

19 *Jane Roe CL 37 v. Uber Technologies,*  
20 *Inc., et al., No. 3:24-cv- 05728-CRB*

21 *Jane Roe CL 38 v. Uber Technologies,*  
22 *Inc., et al., No. 3:24-cv- 05729-CRB*

23 *Jane Roe CL 42 v. Uber Technologies,*  
24 *Inc., et al., No. 3:24-cv- 05740-CRB*

25 *Jane Roe CL 43 v. Uber Technologies,*  
26 *Inc., et al., No. 3:24-cv- 05741-CRB*

27 *Jane Roe CL 48 v. Uber Technologies,*  
28 *Inc., et al., No. 3:24-cv- 05810-CRB*

*Jane Roe CL 53 v. Uber Technologies,*  
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*Inc., et al., No. 3:24-cv- 05837-CRB*

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*Inc., et al., No. 3:24-cv- 05910-CRB*

1 *Jane Roe CL 65 v. Uber Technologies,*  
2 *Inc., et al., No. 3:24-cv- 06189-CRB*

3 *Jane Roe CL 70 v. Uber Technologies,*  
4 *Inc., et al., No. 3:24-cv- 06863-CRB*

5 *Jane Roe CL 71 v. Uber Technologies,*  
6 *Inc., et al., No. 3:24-cv- 06864-CRB*

7 *Jane Roe CL 76 v. Uber Technologies,*  
8 *Inc., et al., No. 3:24-cv- 07569-CRB*

9 *Jane Roe CL 77 v. Uber Technologies,*  
10 *Inc., et al., No. 3:24-cv- 07571-CRB*

11 *Jane Roe CL 78 v. Uber Technologies,*  
12 *Inc., et al., No. 3:24-cv- 07584-CRB*

13 *Jane Roe CL 79 v. Uber Technologies,*  
14 *Inc., et al., No. 3:24-cv- 07857-CRB*

15 *A.J. v. Uber Technologies, Inc., et al.,*  
16 *No. 3:24-cv- 07929-CRB*

17 *A.R. v. Uber Technologies, Inc., et al.,*  
18 *No. 3:24-cv- 08177-CRB*

19 *Jane Roe CL 81 v. Uber Technologies,*  
20 *Inc., et al., No. 3:24-cv- 08521-CRB*

21 *Jane Roe CL 83 v. Uber Technologies,*  
22 *Inc., et al., No. 3:24-cv- 08525-CRB*

23 *Jane Roe CL 84 v. Uber Technologies,*  
24 *Inc., et al., No. 3:24-cv- 08526-CRB*

25 *Jane Roe CL 85 v. Uber Technologies,*  
26 *Inc., et al., No. 3:24-cv- 08754-CRB*

27 *Jane Roe CL 86 v. Uber Technologies,*  
28 *Inc., et al., No. 3:24-cv- 08756-CRB*

*K.J. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv- 09059-CRB*

*Jane Roe CL 88 v. Uber Technologies,*  
*Inc., et al., No. 3:24-cv- 09145-CRB*

*Jane Doe LS 546 v. Uber Technologies,*  
*Inc., et al., No. 3:24-cv- 09186-CRB*

1 *G.C. v. Uber Technologies, Inc., et al.*,  
2 No. 3:24-cv-09195-CRB

3 *Jane Doe LS 547 v. Uber Technologies,*  
4 *Inc., et al.*, No. 3:24-cv- 09208-CRB

5 *Jane Doe LS 548 v. Uber Technologies,*  
6 *Inc., et al.*, No. 3:24-cv- 09211-CRB

7 *Jane Roe CL 91 v. Uber Technologies,*  
8 *Inc., et al.*, No. 3:24-cv- 09235-CRB

9 *Jane Roe CL 92 v. Uber Technologies,*  
10 *Inc., et al.*, No. 3:24-cv- 09237-CRB

11 *Jane Roe CL 93 v. Uber Technologies,*  
12 *Inc., et al.*, No. 3:24-cv- 09549-CRB

13 *Jane Roe CL 98 v. Uber Technologies,*  
14 *Inc., et al.*, No. 3:25-cv- 00853-CRB

15 *B.M. v. Uber Technologies, Inc., et al.*,  
16 No. 3:25-cv- 00982-CRB

17 *Jane Roe CL 101 v. Uber Technologies,*  
18 *Inc., et al.*, No. 3:25-cv- 01118-CRB

19 *Jane Roe CL 102 v. Uber Technologies,*  
20 *Inc., et al.*, No. 3:25-cv- 01120-CRB

21 *Jane Doe LS 550 v. Uber Technologies,*  
22 *Inc., et al.*, No. 3:25-cv- 01327-CRB

23 *Jane Roe CL 103 v. Uber Technologies,*  
24 *Inc., et al.*, No. 3:25-cv- 01347-CRB

25 *Jane Roe CL 105 v. Uber Technologies,*  
26 *Inc., et al.*, No. 3:25-cv- 01349-CRB

27 *Jane Roe CL 107 v. Uber Technologies,*  
28 *Inc., et al.*, No. 3:25-cv- 01470-CRB

*Jane Doe LS 553 v. Uber Technologies,*  
*Inc., et al.*, No. 3:25-cv- 01493-CRB

*Jane Roe CL 109 v. Uber Technologies,*  
*Inc., et al.*, No. 3:25-cv- 01652-CRB

*Jane Roe CL 110 v. Uber Technologies,*  
*Inc., et al.*, No. 3:25-cv- 01653-CRB

1 *Jane Doe LS 554 v. Uber Technologies,*  
2 *Inc., et al.,* No. 3:25-cv- 01693-CRB

3 *Jane Roe CL 114 v. Uber Technologies,*  
4 *Inc., et al.,* No. 3:25-cv- 01942-CRB

5 *K.G. v. Uber Technologies, Inc., et al.,*  
6 No. 3:25-cv- 01962-CRB

7 *TA.W. v. Uber Technologies, Inc., et al.,*  
8 No. 3:25-cv- 01967-CRB

9 *Jane Roe CL 118 v. Uber Technologies,*  
10 *Inc., et al.,* No. 3:25-cv- 02132-CRB

11 *Jane Roe CL 119 v. Uber Technologies,*  
12 *Inc., et al.,* No. 3:25-cv- 02133-CRB

13 *Jane Roe CL 122 v. Uber Technologies,*  
14 *Inc., et al.,* No. 3:25-cv- 02138-CRB

15 *Jane Doe LS 580 v. Uber Technologies,*  
16 *Inc., et al.,* No. 3:25-cv- 02460-CRB

17 *Jane Roe CL 126 v. Uber Technologies,*  
18 *Inc., et al.,* No. 3:25-cv- 02495-CRB

19 *Jane Roe CL 127 v. Uber Technologies,*  
20 *Inc., et al.,* No. 3:25-cv- 02496-CRB

21 *Jane Roe CL 130 v. Uber Technologies,*  
22 *Inc., et al.,* No. 3:25-cv- 02742-CRB

23 *Jane Roe CL 131 v. Uber Technologies,*  
24 *Inc., et al.,* No. 3:25-cv- 02743-CRB

25 *Jane Roe CL 135 v. Uber Technologies,*  
26 *Inc., et al.,* No. 3:25-cv- 02747-CRB

27 *Jane Doe LS 582 v. Uber Technologies,*  
28 *Inc., et al.,* No. 3:25-cv- 02792-CRB

*Jane Doe LS 584 v. Uber Technologies,*  
*Inc., et al.,* No. 3:25-cv- 02806-CRB

*Jane Roe CL 137 v. Uber Technologies,*  
*Inc., et al.,* No. 3:25-cv- 03036-CRB

*Jane Roe CL 138 v. Uber Technologies,*  
*Inc., et al.,* No. 3:25-cv- 03137-CRB

1 *Jane Doe LS 589 v. Uber Technologies,*  
2 *Inc., et al.,* No. 3:25-cv- 03216-CRB

3 *Jane Doe LS 590 v. Uber Technologies,*  
4 *Inc., et al.,* No. 3:25-cv- 03217-CRB

5 *Jane Roe CL 139 v. Uber Technologies,*  
6 *Inc., et al.,* No. 3:25-cv- 03255-CRB

7 *Jane Roe CL 142 v. Uber Technologies,*  
8 *Inc., et al.,* No. 3:25-cv- 03258-CRB

9 *Jane Doe LS 592 v. Uber Technologies,*  
10 *Inc., et al.,* No. 3:25-cv- 03266-CRB

11 *Jane Doe LS 593 v. Uber Technologies,*  
12 *Inc., et al.,* No. 3:25-cv- 03269-CRB

13 *Jane Doe LS 594 v. Uber Technologies,*  
14 *Inc., et al.,* No. 3:25-cv- 03274-CRB

15 *T.G. v. Uber Technologies, Inc., et al.,*  
16 No. 3:25-cv- 03261-CRB

**DECLARATION OF MICHAEL B. SHORTNACY**

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs represented by for noncompliance with this Court’s order.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia Court of Appeals, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On March 19, 2024, this Court entered Pretrial Order No. 10 (“PTO 10”) in this matter, requiring each Plaintiff to “submit a completed PFS, and executed Authorizations, through MDL Centrality.” ECF No. 348 at 4. PTO 10 required each Plaintiff whose case was a part of the MDL by March 26, 2024 to submit a PFS within 60 days of that date—i.e., by May 25, 2024. *Id.* at 5. Each Plaintiff who joined the MDL after March 26, 2024 has to submit a PFS within 30 days of joining. *Id.* at 6.

4. Attached to this declaration as **Exhibit A** is a table identifying 77 Plaintiffs who, as of the date of this Declaration, have failed to submit a Plaintiff Fact Sheet (“PFS”) by their deadline to do so. The Plaintiffs’ deadlines are identified in the table at Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 16 , 2025 in Los Angeles, CA.

**SHOOK, HARDY & BACON L.L.P.**

/s/ Michael B. Shortnacy

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